Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	GN Docket No. 25-133
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Comments of the
Alliance for Telecommunications Industry Solutions (ATIS)

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SUMMARY

The Alliance for Telecommunications Industry Solutions (ATIS) recommends the changes outlined below to the Commission's rules and practices related to communications outage reporting, 911 requirements, wireless emergency alerts, and numbering. ATIS believes that these recommendations would reduce unnecessary regulatory burdens and foster innovation. As explained in these comments, ATIS recommends changes to Commmission's rules and practices to reflect that:

- The 900,000 user minute outage reporting threshold in Part 4 of the Commission's rules is unduly low and has resulted in the overreporting of minor and non-service affecting outages;
- The reporting thresholds for major facility outages are too low and do not consider technological advancements;
- A de minimis exception for wireless networks outages would reduce the number of unimpactful outage reports associated with events that are not outages;
- The Commission's 988 and 911 notification rules result in overreporting and should be revised;
- Clarification of the Commission's practices regarding the waiving of NORS reporting obligations during DIRS activations is necessary to fulfill the purpose of the waiver;
- Further suspending NORS reporting obligations for surrounding counties would reduce redundant and burdensome reporting obligations while more accurately reflecting the status of critical infrastructure;
- The Commission's rules regarding the submission of final DIRS reports are unnecessarily restrictive;
- The deadline for the submission of non-VoIP initial outage notifications is unnecessarily short and should be extended;
- Initial outage reports are unnecessary and should be eliminated;
- Elimination of simplex reporting requirement under Part 4 would reduce unnecessary burdens associated with incidents that are non-outages;
- The requirement in Section 9.10(i)(2)(ii)(A) of the Commission's Rules regarding uncompensated barometric pressure is unnecessary;
- The Commission's rules regarding the National Emergency Address Database (NEAD) are unnecessary and should be deleted;
- The use of multilingual WEA templates creates unnecessary challenges that are unwarranted given the development of machine learning;

- The definition of WEA-capable mobile devices in Section 10.10(k) of the Commission's rules is unnecessary and should be deleted;
- The Commission's *Seventh Report and Order* in PS Docket Nos. 15-91 and 15-94 will create consumer confusion and not advance the goal of reducing WEA opt outs;
- The Commission should take steps to allow more efficient use of numbering resources by evaluating the existing use of the 700, 950, and 976 Codes to determine if these special use Codes may be used as General Purpose Codes and/or NPAs;
- The 30-day notice by VoIP providers of intent to request numbering resources is discriminatory and unnecessarily burdensome;
- All-services distributed overlays, boundary elimination overlays, and multiple overlays are the most efficient and least burdensome geographic area code relief methodologies; and
- A transition plan to nationwide 10-digit local dialing encourages the efficient use of numbering resources.

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The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission's (Commission) March 12, 2025, *Public Notice* in the above-referenced docket. In the *Public Notice*, the Commission seeks comment on deregulatory initiatives that would facilitate and encourage U.S. firms' investment in modernizing their networks, developing infrastructure, and offering innovative and advanced capabilities.[1] ATIS supports the Commission's efforts to alleviate unnecessary burdens and has identified a number of Commission regulations that ATIS believes are unnecessary, burdensome and/or and hamper innovation.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software

[1] *Public Notice* at p.1.

developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' input to the *Public Notice* reflects input from a number of ATIS committees and forums, specifically its:

- Emergency Services Interconnection Forum (ESIF)**,** which develops Next Generation 911 (NG911) and location accuracy requirements and solutions. ESIF works with industry and government, standards, and public safety organizations to apprise them of its deliberations and decisions, and to ensure the proper coordination of activities. ESIF identifies and resolves technical and operational issues to facilitate interconnection of emergency services networks with other networks (e.g., wireline, cable, satellite, Internet, etc.).
- Industry Numbering Committee (INC), which is the industry's open forum for addressing and developing solutions for numbering issues. INC addresses and resolves industry-wide issues associated with planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) numbering resources within the NANP area. INC guidelines and recommendations are used by the North American Numbering Plan Administration (NANPA) and the Canadian Radio Television and Telecommunications Commission (CRTC) in the management of numbering resources.
- Network Reliability Steering Committee (NRSC), which strives to improve network reliability by providing timely consensus-based technical and operational expert guidance to all segments of the public communications industry. As a trusted expert, the NRSC addresses network reliability improvement opportunities in an open, noncompetitive environment. The NRSC advises the communications industry through developing and issuing standards, technical requirements, technical reports, bulletins, Best Practices, and annual reports.
- Wireless Technologies and Systems Committee (WTSC), which develops wireless radio access, system, and network solutions related to wireless and/or mobile services and systems. WTSC develops and continues to enhance solutions necessary to support a U.S. public warning system and wireless emergency alert system. ATIS is the 3GPP North American partner, and WTSC provides critical technical review and input for necessary contributions. WTSC WEA is responsible for requirements, architecture, mobile device behavior, and more for Wireless Emergency Alerts and has since enhanced WEA standards and solutions. This group is comprised of members of the WTSC Systems and

Networks (SN) subcommittee as well as key stakeholders from the Department of Homeland Security, Federal Emergency Management Agency, the National Weather Service, and earthquake experts.

I. COMMENTS

In its *Public Notice*, the Commission encourages commenters to consider certain policy factors, including whether: (1) cost-benefit considerations support the elimination or modification of rules or regulatory practices; (2) experience gained in the implementation of a given rule or practice provides reason to believe that it is unnecessary or inappropriate; (3) marketplace or technological changes have rendered rules or practices unnecessary or inappropriate, (4) a rule or practice poses a barrier to entry or to competition; (5) changes in the broader regulatory context demonstrate that particular Commission rules are unnecessary or inappropriate; (6) rules or practices should be changed due to changes in the governing legal framework; or (7) any other considerations relevant to the identification of existing rules or practices that are unnecessary or inappropriate.[2] ATIS is pleased to have the opportunity to provide its input below regarding Commission rules and practices that can be deleted or modified based on one or more of these factors.

A. Part 4 – Disruption to Communications[3]

- **The 900,000 User Minute Threshold for Outage Reporting Is Unduly Low and Has Resulted in the Overreporting of Minor and Non-Service Affecting Outages.** Section 4.9 of the Commission's rules specifies the threshold criteria for communications outage reporting. Many of the reporting thresholds are based on whether the outage potentially impacts at least 900,000 user minutes, a threshold adopted by the Commission in 2004.[4] Since this time, the industry has gained a great deal of experience reporting outages that meet this threshold. Based on this experience, the industry believes that the existing 900,000 user minute threshold is too low and results in over reporting of low-impact and even non-service-affecting outages. To reduce unnecessary burdens on the industry, ATIS

[2] *Public Notice* at pp. 2-5.

1. [3] Input for this section was provided by ATIS NRSC.

[4] New Part 4 of the Commission's Rules Concerning Disruptions to Communications, *Report and Order and Further Notice of Proposed Rulemaking*, ET Docket No. 04-35, 19 FCC Rcd 16830, ¶55 (2004) (*2004 Part 4 Order*).

urges the Commission to modify the outage reporting threshold from 900,000 user minutes to 2,000,000 user minutes. This change would mitigate the resulting flood of paperwork and emails for industry and public safety alike and enable stakeholders to focus resources on service maintenance and restoration during and after outage and disaster events. This change would reduce administrative burdens by focusing on high impact events, supporting modern network architecture, ease compliance for small and medium providers, and encouraging strategic reliability investments by allowing the industry to concentrate on prevention rather than paperwork. Overall, increasing the user-minute threshold to 2,000,000 user minutes would help providers focus on meaningful service disruptions while maintaining robust transparency and public safety protections.

- **The Reporting Thresholds for Major Facility Outages Are Too Low and Do Not Consider Technological Advancements**. Section 4.9 of the Commission's rules requires service providers to report outages of at least 30 minutes in duration that affects 667 OC3 minutes.[5] The Commission adopted this threshold in 2016 to account for the continued evolution of communications networks, with the hope that it would lead to "reduced reporting of minor incidents, allowing time and resources for an increased focus on meaningful outage reporting that is more likely to have a user material impact."[6] The original intent behind adopting the 667 OC3 minute threshold was to reduce minor incident reporting. Moving to a higher capacity threshold would better accomplish this goal, even though this threshold still results in overreporting and the reporting of minor incidents. The 667 OC3 minute threshold was adopted based on a conversion from the previous 900,000 user minute threshold for voice-grade users[7] -- a metric that has outlived its usefulness for major transport facilities given the rapid technological advancements since the outage reporting rules were adopted in 2004. Today's software defined networks are inherently designed to limit the duration of outages, making thresholds based on older technology outdated. A higher threshold would be more beneficial to the Commission and allow service providers to redirect resources from compliance paperwork to proactive network maintenance and incident prevention. The Commission should increase the threshold for major transport facility outages from 667 OC3 minutes to 167 OC48 minutes to account for the continued evolution of networks. Transitioning to an OC48-based outage threshold would modernize the Commission's reporting framework to match the capabilities and architecture of today's networks. This change would also provide regulatory relief for providers, operational clarity for the Commission, and an enhanced focus on major network issues that truly warrant federal oversight.

- **The Commission Should Reduce Unnecessary Overreporting of Outages Affecting Entities Enrolled in Telecommunications Service Priority Program at Priority Level 2.** ATIS recommends that the Commission modify Section 4.9 of its rules to address the overreporting of outages affecting entities enrolled in the Telecommunications Service Priority (TSP) Program at Priority Level 2. ATIS recommends that the Commission

[5] 47 C.F.R. § 4.9(a)(2), (b), (e)(1)(iii), (f)(2).
[6] Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications, *Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration*, PS Docket Nos. 15-80 and 11-82, ET Docket No. 04-35, 31 FCC Rcd. 5817, ¶18 (2016) (*2016 Report and Order*).
[7] *Id*., ¶12.

modify its rules to extend the minimum duration of reportable outages affecting entities enrolled in the TSP at Priority Level 2 from 30 minutes to four (4) hours. At the request of the Public Safety and Homeland Security Bureau, ATIS reviewed changes to TSP Levels 1 and 2 reporting criteria, noting that the number of reports regarding these facilities skyrocketed after the Commission adopted its *2016 Report and Order* modifying the rules regarding outage reports for special offices and facilities. The Commission advised ATIS that the volume of unnecessary reports has reduced the effectiveness of outage reporting. Many TSP Level 2-related reports are withdrawn before completion, indicating they were submitted out of procedural obligation rather than substantive need. ATIS examined this issue and concluded that increasing the duration of reportable events impacting TSP Priority Level 2 would more effectively mitigate unwarranted overreporting, thereby providing the Commission with more actionable data regarding the true status of these services. An analysis of outage data by ATIS indicates that a change in the TSP reporting threshold from the current 30-minute duration threshold to a four-hour duration threshold would reduce the number of withdrawn reports by approximately 41.6% and final reports by approximately 20.9% in a study of Network Outage Reporting System (NORS) outage data.[8] Refining outage reporting rules applicable to TSP at Priority Level 2, and increasing the minimum reportable outage duration to four hours, would lead to more targeted, actionable reporting. This shift benefits both service providers and the Commission by reducing administrative overhead, improving data relevance, and allowing for more efficient regulatory oversight of communications critical to national security and emergency preparedness.

- **A De Minimis Exception for Wireless Networks Outages Would Reduce the Number of Unimpactful Outage Reports Associated with Events Are Not Outages**. Section 4.9(e)(1) of the Commission's rules requires wireless service providers to submit notifications to the Commission within 120 minutes of discovering an outage of at least 30 minutes duration in five discrete instances.[9] Section 4.9(e)(2) further provides that, in determining the number of users potentially affected by a failure of a switch, a wireless provider must multiply the number of macro cell sites disabled in the outage by the average number of users served per site, which is calculated as the total number of users for the provider divided by the total number of the provider's macro cell sites.[10] With the transition to newer technologies, including specifically 5G, service providers are installing additional cell sites and increasing the densification of wireless infrastructure. These new systems are more resilient and reliable because they have greater overlaps in coverage between Mobile Switching Centers (MSC). The additional cell sites and increased densification make it highly unlikely that the loss of a single cell site (or small

[8] This figure is based on an ATIS NRSC evaluation of NRSC member outage reports. This evaluation also determined that changing the reporting threshold from 30 minutes to four (4) hours for Special Offices and Facilities enrolled in TSP Priority Levels 1 and 2 would reduce the number of outage reports by approximately 40% and the number of withdrawn reports by approximately 60%.

[9] These include Mobile Switching Center outages, outages that potentially affect at least 900,000 user minutes, outages that affects at least 667 Optical Carrier 3 minutes, outages that potentially affect any special offices and facilities, and outages that potentially affect a 911 special facility. 47 C.F.R. § 4.9(e)(1).

[10] 47 CFR § 4.9(e)(2).

number of cell sites) would create an "outage." As a result, the loss of a single cell site would not result in the "significant degradation in the ability of an end user to establish and maintain a channel of communications as a result of failure or degradation in the performance of a communications provider's network."[11] ATIS therefore recommends that the Commission establish a de minimis exception to its outage reporting rules pertaining to wireless events under which outage reports would not be required to be filed if an outage affects: four (4) or fewer macro cell sites located in Rural Service Areas (RSAs); or 14 or fewer macro cell sites located in Metropolitan Service Areas (MSAs). Modifying reporting thresholds will more accurately reflect the true impact on wireless services, while also decreasing the number of NORS wireless reports pertaining to outages that have little or no impact on customers.[12] ATIS NRSC believes that standardizing reporting thresholds for wireless providers would reduce the number of unimpactful reports associated with events that do not meet the Commission's "outage" criteria (e.g., that do not result in a significant degradation in the ability of an end user to establish and maintain a channel of communications).

- **The Commission's 988 and 911 Notification Rules Result in Overreporting and Should Be Revised.** On November 18, 2022, the Commission released a *Second Report and Order* adopting amendments to the rules governing outage reporting to ensure that 911 special facilities, including Public Safety Answering Points (PSAPs), receive information about 911 service outages that potentially affect them.[13] In addition, on July 21, 2023, the Commission released a *Report and Order* adopting amendments to the Commission's rules to address notification of outages impacting the 988 Suicide & Crisis Lifeline.[14] These obligations, which will become effective on April 15, 2025, require providers to report an outage that potentially affects a 911 special facility (as defined in § 4.5(e)) or potentially affects a 988 special facility (as defined in § 4.5(f)), in which case the providers also must notify the affected facility in the manner described in paragraph (h) or (i) of Section 4.9.[15] Section 4.9(h) specifies the content, means, and timing of notifications and, as modified, requires carriers to send outage notifications to PSAPs as soon as possible, but not to exceed 30 minutes.[16] Frequently, this abbreviated timeframe results in carriers having to begin the process of sending out notifications before carriers have confirmed critical, relevant information regarding the causes, effects, and/or the geographic scope of the outage. Accordingly, outage notifications do not contain various informational elements that are important for PSAPs, or the information within the

[11] *See* definition of "outage" in 47 CFR § 4.5(a)
[12] ATIS NRSC studied NORS data from the third quarter of 2019 and found that application of this de minimis threshold would result in a decrease in the number of low-impact events reported in NORS by 91.1% for MSAs and 53.5% for RSAs. These figures are based on an ATIS NRSC evaluation of NRSC member outage reports.
[13] *See* Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; Improving 911 Reliability, New Part 4 of Commission's Rules Concerning Disruptions to Communications, *Second Report and Order*, PS Docket Nos. 15-80 and 13-75, ET Docket No. 04-35, 37 FCC Rcd 13847 (2022) (*2022 Second Report and Order*).
[14] Ensuring the Reliability and Resiliency of the 988 Suicide & Crisis Lifeline; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; Implementation of the National Suicide Hotline Improvement Act of 2018, *Report and Order*, PS Docket Nos. 23-5 and 15-80, WC Docket No. 18-336, 38 FCC Rcd 6917 (2023) (*988 Report and Order*).
[15] *See* 47 CFR § 4.9(a)(4), (c)(2)(iv), (e)(1)(v), (f)(4), (g)(1)(i).
[16] 47 CFR § 4.9((h).

notification is qualified (i.e., "you *may* have experienced an outage"). The Commission's outage reporting rules for 911- and 988-related outages should be modified by reverting to the previous "as soon as possible" standard. This would provide originating service providers with more flexibility to ensure that outage notifications contain useful information and avoid exacerbating outage notification fatigue among PSAPs.

- **Clarification of the Commission's Practices Regarding the Waiving of NORS Reporting Obligations During Disaster Information Reporting System (DIRS) Activations Is Necessary to Fulfill the Purpose of the Waiver**. The Commission, in its *Second Report and Order* in PS Docket Nos. 21-346 and No. 15-80 ET Docket No. 04-35, codified its practice of waiving NORS filings that would be due while DIRS is activated.[17] While ATIS supports the Commission's efforts to codify this waiver, it urges the Commission to reduce unnecessary burdens by clarifying the application of this waiver to certain situations.[18] First, ATIS NRSC requests that the Commission clarify that the waiver applies to: (1) outages that occur just prior to the activation of DIRS; and (2) outages for which notifications or initial reports have already been filed in NORS. Further, for reports that have already been filed in NORS under the conditions outlined in this second scenario, the Commission should permit providers to withdraw those NORS reports. To further alleviate unnecessary burdens, the Commission should also clarify that the waiver also applies to both DIRS and DIRS-Lite activations and to outage notification requirements affecting special facilities, as defined in Section 4.9 of the rules, including 911 and 988 Suicide & Crisis Lifeline notifications adopted by the Commission in its *988 Report and Order.* The Commission should clarify that its waiver applies to these notifications and not require providers to submit these notifications while DIRS has been activated. ATIS believes these clarifications are entirely consistent with the purpose of the waiver, as the notification requirements derive from an underlying NORS reporting obligation, and further the Commission's goals of enabling service providers to better focus on restoring service during major disasters by eliminating certain reporting requirements. Without these clarifications, many providers are forced to defensively file unnecessary NORS reports for any outage that may, but may not, be related to DIRS activation or risk possible Commission fines or penalties.

- **Further Suspending NORS Reporting Obligations for Surrounding Counties Would Reduce Redundant and Burdensome Reporting Obligations While More Accurately Reflecting the Status of Critical Infrastructure.** Under the current Commission DIRS process, service providers can only submit data for states and counties explicitly listed in an activation. However, disasters often impact areas beyond these defined boundaries, including adjacent counties that experience real network degradation or customer disruption. Because DIRS rejects reports outside the designated areas, valuable data is excluded, limiting situational awareness. To address this, ATIS proposes that the Commission introduce a mechanism allowing providers to flag adjacent county data as

[17] Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications, *Second Report and Order,* PS Docket Nos. 21-346 and 15-80, and ET Docket No. 04-35 (2024), ¶25 (*2024 Second Report and Order*).

[18] *See* ATIS*' Petition for Petition for Clarification and/or Reconsideration*, submitted May 10, 2024, in PS Docket Nos. 21-346 and 15-80 and ET Docket No. 04-35.

"related but outside the current activation scope." This approach would enhance visibility for the Commission, improve coordination with public safety, and provide regulatory flexibility. Critically, it would benefit service providers by enabling them to assess and report disaster impact holistically, rather than being constrained by a static, pre-defined geography that may not reflect the reality of network conditions.

- **The Commission's Rules Regarding the Submission of Final DIRS Reports Are Unnecessarily Restrictive**. ATIS recommends that additional time be afforded for providers to submit final DIRS reports upon deactivation of DIRS. In its *2024 Second Report and Order*, the Commission required providers with ongoing outages at the time of a DIRS deactivation to provide a final DIRS report that describes their current infrastructure status at the time the system was deactivated within 24 hours of deactivation.[19] The Commission should extend this deadline from 24 hours to no sooner than 72 hours after DIRS deactivation. There is simply no need for these reports to be filed so quickly. Providers should be given more time to evaluate the outage and its impacts so that the Commission may get a more accurate and complete picture of post-disaster infrastructure status. The Commission should also eliminate the requirement that these final DIRS reports include estimated resolution dates or specify that providers would not be held accountable for failing to meet estimated restoration times and for impacts that have yet to be discovered. During the most recent DIRS activation for severe storms in the Midwest, service providers encountered significant challenges in meeting the 24-hour reporting deadline due to ongoing safety concerns in some affected areas. In several counties, conditions had not yet stabilized enough for technicians to safely assess damage or service availability, making timely and complete reporting impractical. Compounding this issue is the fact that the Commission's DIRS User Guide has not been updated to reflect the new mandatory DIRS reporting requirements effective February 20, 2025. As a result, providers face confusion about how and where to document this new obligation in their reports. The lack of updated guidance creates uncertainty and raises the risk of unintentional noncompliance. An updated guide and greater flexibility in early reporting windows would help providers balance safety, accuracy, and regulatory expectations. Service providers should be afforded significant flexibility during and after a disaster and ATIS strongly believes that disaster response efforts deserve the same level of flexibility as has been extended to other administrative tasks, consistent with existing Commission practices. Granting ATIS' request would facilitate service restoration by allowing service providers to focus on repairing and restoring the network, rather than on notifications. This change is also consistent with the intent of DIRS, which was adopted to provide a simplified and consistent process for service providers to report communications infrastructure status and situational awareness information during times of crisis.

- **The Deadline for the Submission of Non-VoIP Initial Outage Notifications Is Unnecessarily Short and Should Be Extended**. Section 4.9 of the Commission's rules require cable, satellite, SS7, wireless, and wireline providers to notify the Commission within 120 minutes of discovering a qualifying outage and interconnected VoIP service providers to report their 911-related outages within 240 minutes of discovery and other

[19] *2024 Second Report and Order*, ¶27. *See also* 47 CFR § 4.18 (a)(2).

outages within 24 hours of discovery.[20] These notification deadlines should be harmonized, as the 120-minute deadlines are unnecessarily short. Extending the initial outage notification deadline to 24 hours would result in a meaningful reduction in regulatory paperwork by allowing service providers time to gather accurate data, minimizing premature or inaccurate filings. Aligning with VoIP timelines would also reduce redundant reports and streamline the overall reporting process. Within 120 minutes of discovery, service providers might not have enough information to know whether they have a reportable outage, and the data they do have might not be accurate. Indeed, the threat of fines and penalties from the Commission has historically encouraged providers to submit incomplete information to avoid enforcement actions; as opposed to providing complete, useful, and actionable information. The Commission itself has observed that short timeframes can lead to inaccurate reporting, or over-reporting.[21] Rather than forcing providers to divert critical resources toward notifying the Commission within two or four hours of discovering an outage, the Commission should establish a uniform notification deadline for non-911 related outages from cable, satellite, SS7, wireless, and wireline providers of 24 hours from discovery, to be consistent with the VoIP notification period.

- **Initial Outage Reports Are Unnecessary and Should be Eliminated.** Currently, Section 4.9 of the Commission's rules require cable, satellite, SS7, wireless, and wireline providers to submit an initial outage report to the Commission within 72 hours of discovering a reportable outage.[22] Interconnected VoIP providers, however, are exempt from the initial reporting requirement.[23] The Commission adopted its initial outage report requirement for cable, satellite, SS7, wireless, and wireline providers because it thought, "[t]he data contained in the initial report would tend to be more complete and accurate than those that are filed at the two-hour mark under our current reporting rule."[24] However, gathering information for this report comes at the expense of addressing the outage and collecting accurate data. Indeed, carriers often lack complete information the report requires even 72 hours after an outage, leading to incomplete filings. There is no reason to require carriers to submit these initial reports, particularly if additional time is given for the first notification. The Commission already has situational awareness of the outage – including notice and an opportunity to engage if needed – from the carriers' notification. A detailed account of the outage will be made available in the carriers' final outage report due 30 days from the date the outage began. The Commission already uses this two-tiered reporting system with interconnected VoIP providers, who only need to provide notification and a final report. In deciding not to apply the initial report requirement to interconnected VoIP providers, the Commission noted that "eliminating the initial report would reduce providers' workloads considerably without harming the

[20] 47 C.F.R. § 4.9(a), (c)(1), (d), (e)(1), (f), (g)(1).
[21] *See* Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice over Internet Protocol Service Providers & Broadband Internet Service Providers, *Report and Order*, PS Docket No. 11-82, 27 FCC Rcd. 2650, ¶95 (2012) (*2012 Report and Order*).
[22] 47 C.F.R. § 4.9(a)(4), (c)(3), (d), (e)(4), (f)(4). *See also* § 4.11.
[23] The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers, *Report and Order*, PS Docket No. 11-82 (2012), ¶96.
[24] *2004 Part 4 Order*, ¶75.

Commission's ability to react in the short term or facilitate the development and application of best practices in the long term."[25] That same reasoning applies equally to other providers. Based on Commission data, preparing the Commission's 72-hour initial outage reports imposes a significant burden on service providers. The Commission assigns a cost of $55 per hour for a miscellaneous communications employee.[26] Using 39 months of Commission outage data presented at NRSC public meetings, it is estimated that non-VoIP providers filed 83,000 initial reports during this period. At the Commission's estimated 45 minutes per report, this equates to approximately 62,000 hours of labor, costing providers an estimated $4.6 million. Spread over 39 months, this workload translates to approximately 16 full-time employees dedicated solely to preparing these reports. These figures highlight the substantial operational and financial burden the current outage reporting framework imposes on the industry.

- **Elimination of Simplex Reporting Requirement Under Part 4 Would Reduce Unnecessary Burdens Associated with Incidents that Are Non-Outages.** The Commission should strongly consider eliminating the requirement to report simplex events under Part 4 of its outage reporting rules. A simplex event, fundamentally, is not an outage – it is a loss of diversity in a redundant circuit, not a loss of service. This distinction is critical. In a properly engineered network, simplex conditions are designed to be transparent to the end user, meaning that customer service remains fully operational even when a circuit has lost redundancy. As such, the current requirement to report these events conflates system resilience with system failure, mischaracterizing simplex as a service-impacting outage when, in reality, it is a technical condition that does not disrupt service. This issue has been a longstanding point of discussion between service providers and the Commission, with providers consistently maintaining that simplex conditions – especially involving high-capacity OCN circuits like OC3 – are internal resiliency matters rather than service-affecting failures. These events are typically addressed through planned maintenance and coordination with other providers, not emergency response. Reporting simplex events creates a significant regulatory burden on service providers without providing any meaningful benefit to public safety or network availability and offers diminishing returns, especially when compared to the cost of compliance it creates. Eliminating this requirement would relieve providers of unnecessary reporting obligations while maintaining focus on events that genuinely affect service continuity and public interest.

B. Part 9 – 911 Requirements[27]

- **Uncompensated Barometric Pressure Is Unnecessary.** Section 9.10(i)(2)(ii)(A) of the Commission's rules requires all CMRS providers to make uncompensated barometric data available to PSAPs with respect to any 911 call placed from any handset that has the capability to deliver barometric sensor information.[28] ATIS urges the Commission to delete this requirement as it does not believe that this data is being used by PSAPs. In

[25] *2012 Report and Order*, ¶97.
[26] *See* Facilitating Implementation of Next Generation 911 Services (NG911) Improving 911 Reliability, *Further Notice of Proposed Rulemaking,* PS Docket Nos. 21-479 and 13-75 (2025), ¶60 n 206 (the Commission calculated an hourly rate of $55.41 for miscellaneous communications worker, which was rounded down to $55).
[27] Input for this section was provided by ATIS ESIF.
[28] 47 C.F.R. § 9.10(i)(2)(ii)(A).

isolation, barometric pressure sensor measurements are highly accurate in measuring relative pressure changes but cannot provide accurate absolute pressure sensor measurements without additional compensation. This technical limitation precludes actionable use of uncompensated barometric pressure as envisioned by the current regulations. The requirement that carriers provide uncompensated barometric pressure was intended to be an interim solution. Since that time, other longer-term solutions have been adopted to address the Commission's vertical accuracy requirements. In addition, uncompensated barometric pressure is not supported for location conveyance in NG911.[29]

- **The Commission's Rules Regarding the National Emergency Address Database (NEAD) Are Unnecessary and Should Be Deleted.** Given the decommissioning of the NEAD, ATIS notes that the rules below are unnecessary and recommends they be deleted:
  - 47 CFR § 9.10(i)(1)(iii) – definition of NEAD;
  - 47 CFR § 9.10(i)(4)(ii) – requirement that CMRS providers submit NEAD progress reports'; and
  - 47 CFR § 9.10(i)(4)(iii) – requirement that CMRS providers file NEAD privacy and security plan.

  These deletions are consistent with the Commission's recommendations in its *Sixth Further Notice of Proposed Rulemaking* in PS Docket No. 07-144 (released March 28, 2025).

C. Part 10 – Wireless Emergency Alerts[30]

The Use of Pre-Scripted Multilingual WEA Templates Creates Unnecessary Challenges that Are Unwarranted Given the Development of Machine Learning. Section 10.480 of the Commission's rules requires CMSPs to support pre-scripted alert templates for certain events.[31] CMSPs are required to support these templates for English, Arabic, Chinese (simplified and traditional), French, German, Haitian Creole, Hindi, Italian, Korean, Portuguese, Russian, Spanish, Tagalog, and Vietnamese.[32] It is on record that a significant majority of Alert Originator (AO) comments indicate no intent to utilize this pre-scripted template solution[33]. Pre-scripted templates do not cover all possible emergency scenarios, limiting the ability to convey specific, real-time information that is critical for public safety. Emergencies are often unpredictable and unique, requiring customized messages. Personalized and detailed messages are more likely to be taken seriously and acted upon. Furthermore, implementation of the template approach will necessitate updates to ATIS standards and 3GPP specifications followed by extensive development, testing and deployment efforts. This development process will affect end-to-end interfaces, including the Common Alerting Protocol (CAP), and subsequently impact the AO Vendor Platforms. Integrating pre-scripted templates with existing

[29] *See* RFC 7459, Representation of Uncertainty and Confidence in the Presence Information Data Format Location Object (PIDF-LO) and precedents.
[30] Input for this section was provided by ATIS WTSC WEA.
[31] 47 CFR § 10.480.
[32] Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System, *Report and Order*, PS Docket Nos. 15-91 and 15-94 (2025), ¶17, adopting 47 CFR §10.480(c).
[33] *See* AO comments to May 13, 2024, *Public Notice* in PS Docket Nos. 15-91 and 15-94.

alerting platforms and systems could require significant technical and procedural adjustments and updates. As previously mentioned, it remains uncertain whether AOs will widely adopt the use of these templates. Therefore, it is impractical to mandate extensive standards development and implementation for a feature that may not see significant use. ATIS recommends focusing on machine translations instead of pre-scripted templates. The rapid advancements and growing interest in AI technology warrant the Commission's attention. ATIS strongly believes that, given the swift progress in AI, machine translations at the device level can offer greater flexibility and effectiveness. Machine translation has the promise to provide a broader array of languages for translation because of its capability to translate alert text in real-time which tailors it to the specific ongoing event. This dynamic approach offers significant advantages over preinstalled templates, benefiting both the alerting community and the citizens receiving the alerts.

- **The Definition of WEA-Capable Mobile Devices in Section 10.10(k) of the Commission's Rules is Unnecessary and Should Be Deleted**. In its *Seventh Report and Order* in PS Docket Nos. 15-91 and 15-94, the Commission adopted a new definition of WEA capable devices.[34] This new definition in Section 10.10(k) of the Commission's rules defines "W*EA-capable mobile device"* as a mobile device, as defined in paragraph (j) of this section, that complies with the Part 10, Subpart E equipment requirements. This rule should be deleted as it unnecessarily micromanages how wireless providers and device manufacturers educate customers about device-capabilities and risks customer confusion.

- **The Commission's *Seventh Report and Order* in PS Docket Nos. 15-91 and 15-94_ Will Create Consumer Confusion and Not Advance the Goal of Reducing WEA Opt Outs.** The WEA per-alert presentation suppression and additional user settings for controlling the attention signal along with the proposed rescoping of the Public Safety Message do not directly address the issue of consumer opt out of WEA. Instead, these modifications will create confusion for the AOs and consumers, endanger lives, and significantly complicate the already challenging training process pivotal to the success of WEA. The choices made by the AOs when using the WEA capabilities will *always* be the primary driver in consumers' confidence level and their opt-out choices. In addition, there is no clear evidence that modifying an alert tone will reduce opt-out, whereas alert relevance and frequency have often been cited as significant contributing factors. The distinctive presentation of the alert, as well as its rendering even on locked phones, ensures that there is no ambiguity regarding that nature of the alert by the device owner and others nearby. Any modification of the current attention-grabbing aspects of the alert attention signal and presentation could significantly and unnecessarily increase the potential for loss of life and property. For these reasons, the Commission should pause this proceeding to allow the formal process of collaboration started by the FEMA IPAWS Working Group to analyze and address recent events to progress.[35] This input will

[34] Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System, *Seventh Report and Order*, PS Docket Nos. 15-91 and 15-94 (2025), ¶22.

[35] The recently formed FEMA IPAWS Working Group gathered stakeholders from across the WEA ecosystem to improve the lines of communications toward to ensure that everyone is better informed. The working group is also

provide the Commission with further insights into whether these changes will reduce consumer opt-outs. Once this analysis is complete, the Commission should reassess its approach to limiting consumer opt-out and determine whether proposed modifications are needed to satisfy the goal of the WEA to rapidly disseminate alerts to consumers to take action to protect their own lives as well as others and/or their property.

The intent of the AOs plan for using silent alerting for specific scenarios, such as for active shooter situations, has not been communicated to the industry. Detailed information on how silent alerts will be managed and their expected behavior in various situations is necessary to determine whether such scenarios can be effectively supported by WEA. In addition, market adoption of these new features will occur gradually over a period of years; hence, in critical situations, the AOs should be aware that they cannot depend on 100% conformance from all devices.

Recent alerting incidents have resulted in a massive number of consumer opt-outs and a decline in trust in the WEA system. However, the changes required in the Commission's *Seventh Report and Order* and proposed in the *Eleventh Further Notice of Proposed Rulemaking* do not address the root causes of these opt-outs, which include the decision-making processes for WEA alert initiation and potentially insufficient knowledge of the end-to-end system operation system capability. For example, the Blue Alert sent at 4:52am on October 4, 2024, to the entire State of Texas was categorized as an Imminent Threat alert, allowing it to bypass Do Not Disturb (DND) on cell phones. Although Blue Alerts are allowed to use the Imminent Threat alert class, the information in this particular alert did not constitute an imminent threat to those receiving the information as defined for this alert class. Had the AO been aware of how this alert would be presented and its implications to recipients, the AO may have chosen to send it as a Public Safety Message given the early hour. A Public Safety Message would not have overridden DND mode, potentially resulting in fewer opt-outs.

D. Numbering[36]

- **The Commission Should Take Steps to Allow More Efficient Use of Numbering Resources by Evaluating the Existing Use of the 700, 950 and 976 Codes to Determine if These Special Use Codes May be Used as General Purpose Codes and/or NPAs.**
    - **The Use of the 700 Code for PIC Verification May Be Unnecessary.** Section 258 of the Communications Act provides that telecommunications carriers shall not submit or execute a change in a subscriber's selection of a provider of telephone exchange service or telephone toll service except in accordance with Commission-prescribed verification procedures.[37] The 700 Central Office (CO) Code and the 700 Number Plan Area (NPA) Code are utilized for Primary Interexchange Carrier (PIC) verification, with specific dialing formats for Intra-LATA (Area Code-700-4141) and Inter-LATA (700-555-4141). In a small number

evaluating current training methods to drive improvements and enhancement in training and the related processes. This collaboration and education effort has greatest potential to reduce consumer opt-out.

[36] Input for this section was provided by ATIS INC.

[37] 47 US Code § 258.

of geographic NPAs, the 700 Code was assigned to specific service providers before its special use designation in 1996. In Canada, the 700 Code has been assigned as a General Purpose Code in 45 instances. Existing 700 Code assignments in the U.S. are grandfathered for their originally assigned purposes. INC's guidelines require that any 700 CO Codes within geographic NPAs returned to the NANPA shall be made unavailable for assignment, to support the continued use of NPA-700-4141 for Intra-LATA PIC verification.[38] Using the 700 CO Code as a General Purpose Code (rather than for PIC verification) would require customer and industry education, as well as a suitable alternative for customers to verify their Intra-LATA PIC if the Commission deems it still necessary. The 700 NPA is an Easily Recognizable Code (ERC) assigned for Interexchange Carrier Services. The Commission should evaluate the continued necessity for PIC verification to determine if the 700 Code can be used as an NPA and the 700 NXXs within geographic NPAs can be assigned as General Purpose Codes.

- **The 950 Code for Feature Group B Service Is Not an Efficient Use of Numbering Resources**. The 950 Code is used to access Feature Group B services that require specialized billing. The 950 Code and the Carrier Identification Code (CIC) constitute a Carrier Access Code (CAC): 950-XXXX. As this (CAC) has been referenced in Commission reports and orders, ATIS believes that any changes to this code may require regulatory direction.[39] There are 125 Feature Group B CICs assigned as of April 7, 2025. Although there is potential for the 950 Code to be opened as an NXX in NPAs where no Feature Group B services are utilized, it is not recommended due to the complexities of switch translations (e.g., permissive 7-digit dialing). The 950 Code cannot be used as an NPA due to conflict with Feature Group B service (i.e., 950-XXXX where XXXX is the CIC). The Commission should evaluate the continued necessity of Feature Group B service to determine if the 950 Code can be used as an NPA and the 950 NXXs within geographic NPAs can be assigned as General Purpose Codes.
- **The 976 Code for Information Delivery Services Is Not an Efficient Use of Numbering Resources**. The 976 Code is designated for special information delivery services, indicating a niche use for the code. The 976 CO Code is not portable, not able to be pooled, and is duplicated in new NPAs during NPA relief efforts. The Commission should evaluate the continued use of the 976 CO Code as a Tariffed service to determine if it continues to serve the public interest, especially considering the efficiency of using both the 900 and 976 Codes for information delivery services in the era of widespread internet access. Because such information is readily available online, using both 900-NXXs (i.e., the entire 900 NPA) and the 976 CO Code within each geographic NPA for special information delivery services is an inefficient use of NANP resources, particularly

[38] ATIS Standard on Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (ATIS-0300119), Section 7.37 (published April 2, 2025). This standard is available at no charge from https://access.atis.org/higherlogic/ws/public/documents?view.

[39] *See* In the matter of AT&T Communication's Tariff F.C.C. Nos. 9 and 11, *Memorandum Opinion and Order*, released August 12, 1994 (DA-94-889A1).

when the quantity of codes that are stranded/unassignable are considered. The Commission should evaluate the continued necessity of using 976 for information delivery services to determine if the 976 Code can be used as an NPA and the 976 NXXs within geographic NPAs can be assigned as General Purpose Codes.

- **The 30-day Notice by VoIP Providers of Intent to Request Numbering Resources is Discriminatory and Unnecessarily Burdensome.** To alleviate unnecessary burdens while also enabling States to verify that interconnected VoIP providers can deploy and properly utilize numbering resources, ATIS recommends the Commission modify 47 CFR § 52.15(g) to only require a 30-day notice before an interconnected VoIP provider's initial request for direct access to numbering resources in the rate center. Application of this notice requirement for all requests is not necessary to ensure the efficient utilization of numbering resources and does not affect a State's ability to enforce compliance with numbering resource utilization and forecast reporting requirements. By requiring prior notification for initial filings only, the Commission would ensure States obtain pertinent information, while greatly reducing the associated burdens and regulatory asymmetry imposed on interconnected VoIP providers. Application of this requirement only to initial requests in a rate center eases the burden on multiple entities: (1) authorized interconnected VoIP providers that must submit the notices; (2) the NANPA that must verify that the notices were submitted before assigning resources; and (3) the States that must collect the notices, and determine if any follow up is necessary.

- **All-Services Distributed Overlays, Boundary Elimination Overlays, and Multiple Overlays Are the Most Efficient and Least Burdensome Geographic Area Code Relief Methodologies.** State commissions were granted the authority to handle matters related to the implementation of new area codes within their respective States under Section 52.19 of the Commission's rules. This authority includes determining the appropriate form of area code relief, such as a geographic split, an overlay area code, or a boundary realignment, as well as establishing new area code boundaries.[40] ATIS urges the Commission to streamline the relief methodology by eliminating all methods except all-services distributed overlay, boundary eliminations overlay, and multiple overlay. Requiring the use of geographic area code overlays would be less burdensome on the parties involved in the planning and implementation of new area codes. Geographic area code overlays, including specifically all-services distributed overlays, have proven to be the most efficient and least confusing methods of introducing a new area code in a geographic relief plan and in moving the nation towards 10-digit local dialing. In fact, in the U.S. there have been 73 area code relief projects in the past 10 years, all of which have been area code overlays. Moreover, as of April 7, 2025, all seven of the planned area codes through June 2026 are all-services distributed overlays.

- **A Transition to Nationwide 10-Digit Local Dialing Encourages the Efficient Use of Numbering Resources**. Currently, the U.S. allows use of both 7- and 10-digit local dialing. However, since the implementation of 988 and with the addition of each new area code overlay, the move toward nationwide 10-digit local dialing has accelerated. As overlays are implemented, more and more areas are converted to 10-digit local dialing. To more effectively use numbering resources, the Commission should establish a

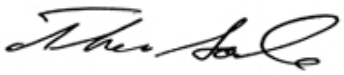
[40] 47 CFR § 52.19(a).

transition plan to nationwide 10-digit local dialing on a structured and consumer-friendly basis as area code relief is needed and overlays are implemented. All-services distributed overlays are the preferred and prevalent form of area code relief today, and their continued implementation in the future will pave the way for an eventual nationwide and standard 10-digit local dialing plan.

III. CONCLUSION

ATIS supports the Commission's efforts to reduce burdens and foster innovation through the deletion of obsolete and unnecessary rules and practices. ATIS strongly believes that the rules identified in these comments can and should be deleted and/or modified as explained above and that these changes will reduce unnecessary burdens and reflect technological improvements.

Respectfully submitted,



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